

JASON M. FRIERSON, NVSBN 7709  
United States Attorney  
District of Nevada

DAVID PRIDDY, ILSBN 6313767  
Special Assistant United States Attorney  
6401 Security Boulevard  
Baltimore, MD 21235  
Telephone: (510) 970-4801  
Facsimile: (415) 744-0134  
E-Mail: David.Priddy@ssa.gov

Attorneys for Defendant

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

BRIDGET ANN CHRISTIANA,

Plaintiff,

v.

KILOLO KIJAKAZI,  
Acting Commissioner of Social Security,

Defendant.

Case No.: 2:22-cv-01978-BNW

**UNOPPOSED MOTION FOR  
EXTENSION OF TIME  
(FIRST REQUEST)**

Defendant, Kilolo Kijakazi, Acting Commissioner of Social Security (Defendant) respectfully requests that the Court extend the time for Defendant to respond to Plaintiff's Opening Brief (Dkt. No. 17, filed on May 24, 2023), currently due on June 23, 2023, by 31 days, through and including July 24, 2023. Defendant further requests that all subsequent deadlines be extended accordingly.

This is Defendant's first request for an extension of time to file a response. Good cause exists for this extension. Defendant respectfully requests this additional time because counsel is currently in the process of determining if a settlement agreement is possible. If the case cannot be settled, then Defendant's counsel will proceed with filing Defendant's response to Plaintiff's Opening Brief. This request is made in good faith and with no intention to unduly delay the proceedings.

1 On June 21, 2023, counsel for Defendant conferred with Plaintiff's counsel, who has no  
2 opposition to this motion.

3 It is therefore requested that Defendant be granted an extension of time to respond to Plaintiff's  
4 Opening Brief, through and including July 24, 2023.

5  
6 Dated: June 21, 2023

Respectfully submitted,

7 JASON M. FRIERSON  
8 United States Attorney

9 /s/ David Priddy  
10 DAVID PRIDDY  
11 Special Assistant United States Attorney

12  
13 IT IS SO ORDERED:

14   
15 UNITED STATES MAGISTRATE JUDGE

16 DATED: June 22, 2023  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

**CERTIFICATE OF SERVICE**

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 6401 Security Boulevard, Baltimore, Maryland 21235. I am not a party to the above-entitled action. On the date set forth below, I caused service of **UNOPPOSED MOTION FOR EXTENSION OF TIME (FIRST REQUEST)** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

Leonard Stone  
Shook & Stone, Chtd.  
710 S Fourth Street  
Las Vegas, NV 89101  
702-385-2220  
Email: lstone@shookandstone.com

Marc V. Kalagian  
Law Offices of Lawrence D. Rohlfing, Inc., CPC  
12631 East Imperial Highway  
Suite C115  
Santa Fe Springs, CA 90670  
562-273-3702  
Fax: 562-868-5491  
Email: marc.kalagian@rksslaw.com

Attorney for Plaintiff

Dated: June 21, 2023

/s/ David Priddy  
DAVID PRIDDY  
Special Assistant United States Attorney